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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SK Shipping (Singapore) PTE Ltd.	Plaintiff,
- against -	
China National Chartering Corporation	Defendant

07 Civ. 03059 (HB)

**NOTICE OF MOTION**

Please take notice that upon the declaration of Randolph H. Donatelli and the exhibits annexed thereto, the declaration of Philip Burns and the exhibits annexed thereto, the accompanying memorandum of law, and upon all prior pleadings and proceedings herein, plaintiff will move this Court before the Honorable Harold Baer, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York, for an order pursuant to the New York Convention on the Recognition and Enforcement of Foreign Arbitral Awards, 9 U.S.C. § 201-208, to confirm the final London arbitration award rendered on March 9, 2007 in favor of plaintiff and against defendant and directing that judgment thereon be entered in favor of plaintiff and against defendant, and that such judgment be satisfied from defendant's funds that are now under restraint with HSBC Bank, and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
June 27, 2007

Respectfully submitted,  
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